

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF IOWA**

In re:)	
)	Chapter 11
MERCY HOSPITAL, IOWA CITY, IOWA, <i>et</i>)	Case No. 23-00623 (TJC)
<i>al.</i> ,)	
Debtors.)	(Jointly Administered)
)	

**NOTICE OF MOTION OF IOWA CITY AMBULATORY SURGICAL CENTER, LLC
FOR ENTRY OF AN ORDER GRANTING RELIEF FROM THE AUTOMATIC STAY
TO PURCHASE UNITS AS A RESULT OF A PERMISSIVE REDEMPTION EVENT**

PLEASE TAKE NOTICE that, on August 8, 2025, the *Motion of Iowa City Ambulatory Surgical Center, LLC for Entry of an Order Granting Relief from the Automatic Stay to Purchase Units as A Result of A Permissive Redemption Event* (the “Motion”) was filed with the United States Bankruptcy Court for the Northern District of Iowa (the “Court”).

PLEASE TAKE FURTHER NOTICE that objections, if any, to the Motion or the relief requested therein must be filed with the Court and served to be received by the following parties no later than August 22, 2025:

- (a) Counsel to Iowa City Ambulatory Surgical Center, LLC, Faegre Drinker Biddle & Reath LLP, 320 S. Canal Street, Suite 3300, Chicago, IL 60606, Attn: Michael T. Gustafson (mike.gustafson@faegredrinker.com); and
- (b) Office of the United States Trustee for the Northern District of Iowa, 111 Seventh Avenue SE, Suite 2800, Cedar Rapids, IA, 52401, Attn: Janet G.L. Reasoner (janet.g.reasoner@usdoj.gov).

PLEASE TAKE FURTHER NOTICE that, if an objection is properly filed and served in accordance with the above procedures, a hearing (the “Hearing”) on the Motion will be held at a time and date to be determined before the Honorable Thad J. Collins, United States Bankruptcy Judge, United States Bankruptcy Court for the Northern District of Iowa, 111 7th Ave, SE, Cedar Rapids, IA 52401. Only objections made in writing and timely filed and received will be considered by the Court at such Hearing.

Dated: August 8, 2025

Respectfully submitted,

/s/ Michael T. Gustafson

Michael T. Gustafson (*Admitted pro hac vice*)
FAEGRE DRINKER BIDDLE & REATH LLP
320 S. Canal Street, Suite 3300
Chicago, IL 60606
Phone: (312) 569-1000
Fax: (312) 569-3000
Email: mike.gustafson@faegredrinker.com

*Counsel to Iowa City Ambulatory Surgical
Center, LLC*

Certificate of Service

The undersigned certifies, under penalty of perjury, that on this 8th day of August 2025, the foregoing document was electronically filed with the Clerk of Bankruptcy Court using the Northern District of Iowa CM/ECF and the document was served electronically through the CM/ECF system to the parties of this case.

/s/ Michael T. Gustafson

Michael T. Gustafson